



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 15 2012

C-14J

By electronic and U.S. Mail

John W. Watson  
Baker & McKenzie  
One Prudential Plaza, Suite 3500  
130 East Randolph Drive  
Chicago, IL 60601

RE: Peabody Midwest Mining, LLC, Bear Run Mine  
Information Request Follow Up

Dear Mr. Watson:

Thank you for the January 20, 2012, response provided on behalf of your client to EPA's Clean Air Act Section 114 Information Request dated November 17, 2011. As we have discussed, EPA feels that a few details of the response need additional discussion. As we are having difficulty finding a mutually-agreeable time for a call to discuss these remaining items, I thought it best to put them in a letter.

The list below comprises areas in which EPA has determined your response to be insufficient or in need of additional clarification:

Section 2.0 Monitor Siting and Installation:

- Our 114 required one year of monitoring. Peabody proposed four months. EPA cannot make an accurate determination of compliance with the National Ambient Air Quality Standards without a year's worth of data, so cannot agree to four months. Please be aware that if a concern arises with respect to nonattainment of the lead standard, we may issue an additional request for a longer period of monitoring.
- Peabody did not submit an AERMOD protocol for modeling. EPA would like modeling results to compare with the wind rose to help determine the best monitor locations.
- Peabody proposed to install only filter based monitors. EPA requires three continuous FEM PM-10 monitors to determine compliance with the 24-hour standard.

- Also, to clarify, TSP filters are to be collected on the 1/3 day sampling schedule as designated by the 2012 Monitoring Schedule. Here is a link to the schedule:  
[http://www.epa.gov/ttn/amtic/files/ambient/pm25/calendar\\_2012.pdf](http://www.epa.gov/ttn/amtic/files/ambient/pm25/calendar_2012.pdf)

Section 5.0 Reporting

- Peabody states that it will provide monthly "letter-type" reports. We ask that all data be provided in electronic format.

Appendix B:

- The data provided matches data from other mines that we have seen. Please confirm that the table of coal lead content reflects actual samples of taken from Bear Run mine, and is not merely an example. Please also identify what the abbreviations "TE" and "STK-TE" mean, and identify both locations by latitude and longitude, or other site-specific criteria.

Please provide a complete written response to each of the previous points by Friday, April 6, 2012. If you have any questions you can reach me at 312-353-8912 or [Schnieders.kathleen@epa.gov](mailto:Schnieders.kathleen@epa.gov).

Sincerely,



Kathleen Kelly Schnieders  
Associate Regional Counsel

cc: S. Marshall, AE-17J